



Land and Chemicals Division

Type of Document:

- ☐ Inspection Report/Checklist
- ☒ **No Violation Letter and Inspection Report**
- ☐ Notice of Violation and Inspection Report
- ☐ Return to Compliance Letter
- ☐ Information Request
- ☐ Pre-Filing Notice and Opportunity to Confer
- ☐ State Notification of Enforcement Action
- ☐ Significant Non-Complier (SNC) Determination

Facility Name: Bio Star Films

Facility Location: 4848 South

Hoyle Avenue

City: Chicago

State: Illinois

U.S. EPA ID#: ILD 984 775 726

Assigned Staff: Graciela Scambiaterra Phone: 3-5103

NAME	SIGNATURE	DATE
Author (CS1 Staff)	<i>Graciela Scambiaterra</i>	12/28/07
Section Chief Initial Review	<i>[Signature]</i>	01/11/08
Regional Counsel	N/A	
Section Chief Final Review	N/A	
LCD Branch Chief	N/A	

Directions/Request for Clerical Support:

After the Section Chief signs this sheet and original letter:

1. Date stamp the cover letter;
2. Make four copies of the contents of this folder:
 - One copy for the assigned staff;
 - One copy for the section file;
 - One copy for the branch file; and
 - One copy for the official file copy.
3. Make any additional copies for cc's or bcc's.
4. Mail the original certified mail and distribute office copies and cc's and bcc's.

Once the certified mail receipt is returned:

5. File the certified mail receipt (green card), with this sign-off sheet and the official file copy, and take to 7th floor RCRA file room;
6. E-mail staff the date that the letter was received by facility.

PS Form 3800, January 2001
See Reverse for Instructions

Postage \$ 114
Certified Fee 265
Return Receipt Fee (Endorsement Required) 215
Restricted Delivery Fee (Endorsement Required)
Total Postage & Fees \$ 594





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

11 JAN 2008

REPLY TO THE ATTENTION OF:

LR-8J

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Larry Johnson
Environmental Coordinator
Bio Star Films
4848 South Hoyne Avenue
Chicago, Illinois 60609

Re: Compliance Evaluation Inspection
EPA I.D. No.: ILD 984 775 726

Dear Mr. Johnson:

On September 10, 2007, a representative of the United States Environmental Protection Agency (U.S. EPA) inspected Bio Star Films (Bio Star) located in Chicago, Illinois. The purpose of the inspection was to evaluate Bio Star's compliance with certain requirements of the Resource Conservation and Recovery Act (RCRA), specifically, those regulations related to the generation, treatment, storage and disposal of hazardous waste. Enclosed please find a copy of our inspection report.

As of this writing, based upon information available to U.S. EPA, our review of the inspection has not resulted in the detection of violations of any of the specific RCRA requirements under evaluation. This determination does not limit the applicability of the requirements evaluated, other RCRA regulations, or regulations under other environmental statutes. U.S. EPA and the Illinois Environmental Protection Agency (Illinois EPA) will continue to evaluate Bio Star in the future.

If you have any questions or concerns regarding this matter, please contact Graciela Scambiaterra, of my staff, at (312) 353-5103.

Sincerely,

Mary S. Setnicar, Acting Chief
Compliance Section 1
RCRA Branch
Land and Chemicals Division

Enclosure
cc: Todd Marvel, Illinois EPA

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 W. JACKSON BOULEVARD
CHICAGO, IL 60604

COMPLIANCE EVALUATION INSPECTION REPORT

INSTALLATION NAME: Bio Star Films

EPA ID No.: ILD 984 775 726

LOCATION ADDRESS: 4848 South Hoyne Ave
Chicago, Illinois 60609

NAICS CODE(s): Unknown

DATE OF INSPECTION: September 10, 2007

U.S. EPA INSPECTOR(s): Graciela Scambiatterra

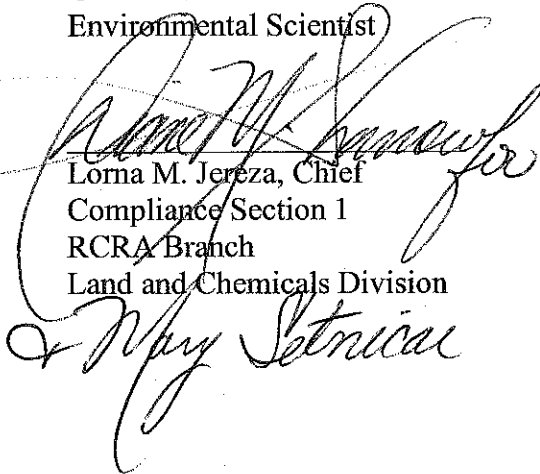
PREPARED BY:



Graciela Scambiatterra
Environmental Scientist

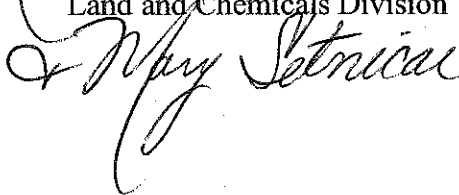
12/28/07
Date

REVIEWED BY:



Lorna M. Jereza, Chief
Compliance Section 1
RCRA Branch
Land and Chemicals Division

01/10/08
Date



RCRA Compliance Evaluation Inspection

Introduction

I, Graciela Scambiatterra, Environmental Scientist, from the U.S. Environmental Protection Agency (U.S. EPA) conducted a hazardous waste compliance evaluation inspection (CEI) at Bio Star Films (Bio Star), located at 4848 S. Hoyne Avenue, Chicago, Illinois. The Purpose of the CEI was to evaluate Bio Star's compliance with certain provisions of the Resource Conservation and Recover Act (RCRA), specifically, those regulations related to the management and disposal of hazardous waste.

I arrived at Bio Star on September 10, 2007 at approximately 9:30am, identified myself and provided my credentials to the Bio Star representative. I interviewed Larry Johnson, Environmental Coordinator, during the inspection. I provided the Small Business Resources Guide and the Sustainable Solutions pamphlet to the representative. Photos are attached.

History and Interview

Bio Star is listed as a federal small quantity generator (SQG) in U.S EPA's RCRAInfo database. However, it appears that they have been operating as a conditionally-exempt small quantity generator (CESQG). They manufacture plastic trash bags and several other plastic products. Bio Star generates a non-hazardous filter cake, water-based ink wastes and Used Oil.

Record Review

Hazardous Waste Determinations

I reviewed the waste determinations for the filter cake waste. Waste Management removes the filter cake waste as a special waste. I also reviewed the compliance sampling documentation for the filter press discharge performed by DAI Environmental.

Site Inspection

Converting Departments:

The site inspection began at the Converting Departments. Here, roll stock is converted into product, mainly plastic bags, of all different sizes and labeling. I did not observe any waste in these areas.

Main Plant:

There are 11 manufacturing process lines in this area. Feedstock used for the manufacturing process includes, resins, alcohol, ammonia, sulfuric acid and aluminum chloride. I observed several containers of printing press ink wastes in this area (see photos 1-2). These ink wastes are processed through the filter press processing system.

Ink Room:

The final area we looked at was the ink room. Here, I observed the filter press system. Photo 3 is of the filter tank and photo 4 is of the main mixing tank. I observed eight drums of ink waste in the area (see photo 5). Mr. Johnson informed me that these wastes were to be processed through the filter press system. Photo 6 is of the filter press where the filter cake is generated. Photo 7 is of the water holding tank where the pH is checked prior to being dispersed to the sewer system.

Outside the ink room, I observed several 55-gallon containers (see photo 8). Most were empty and a few contained ink wastes that are going to be processed through the filter press system. I observed a roll-off box of filter cake in the area (see photo 9). I also observed seven containers of used oil that were labeled (see photo 10). Mr. Johnson informed me that the containers were there to be picked up by Future Environmental, Inc. from Mokena, Illinois. Also in this area immediately outside of the ink room, I observed several 55-gallon containers of ink waste (see photo 11).

Maintenance Department:

The Bio Star site inspection ended at the Maintenance Department. Here, Bio Star repairs and builds machines that are used throughout the facility. I observed a container labeled "Used Oil" (see photo 12). I did not observe any other waste in this area.

This ended the Bio Star site inspection.

Closing Conference

At this time, I thanked the Bio Star representative for his time and explained to him that I was not making any compliance determinations at this time.

This ended the CEI.



Photo 1: Printing press ink waste

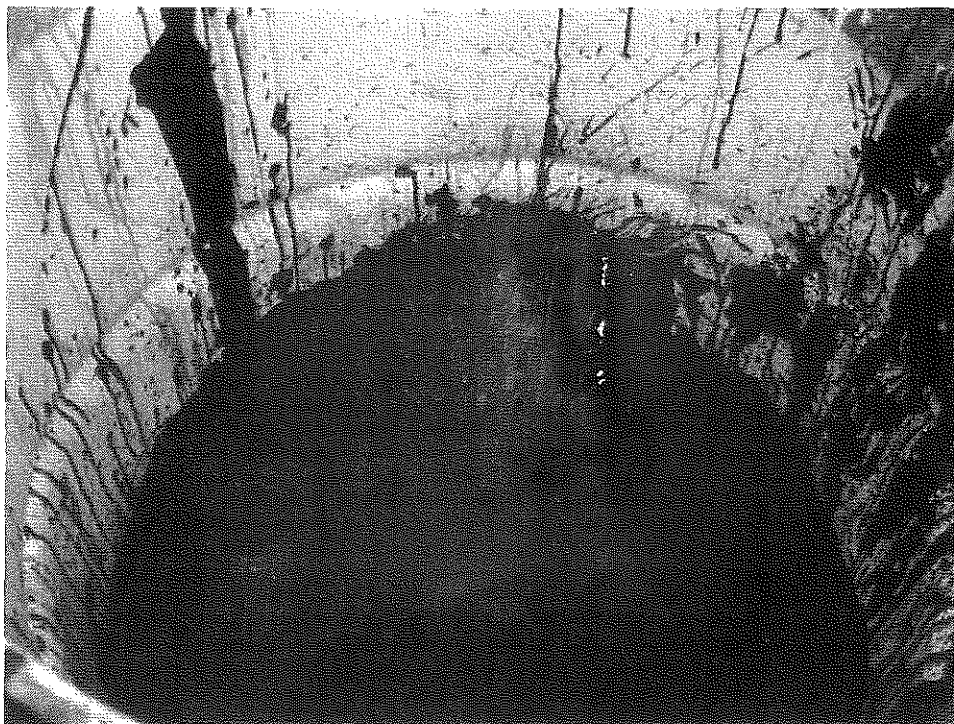


Photo 2: Printing press ink waste



Photo 3: Filter tank

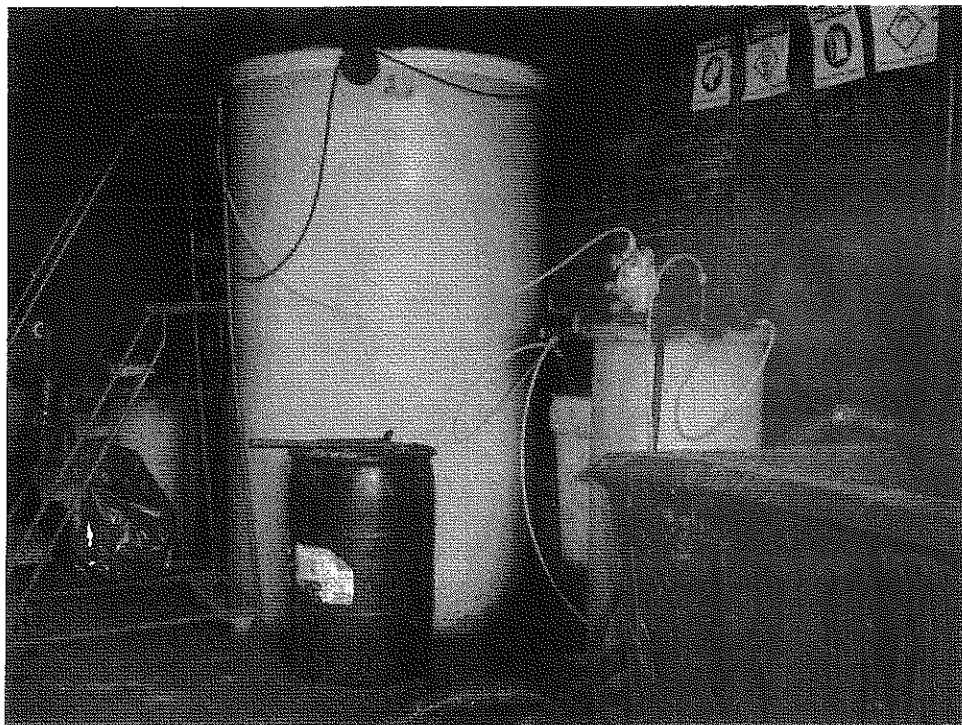


Photo 4: Main mixing tank



Photo 5: Eight drums of ink waste

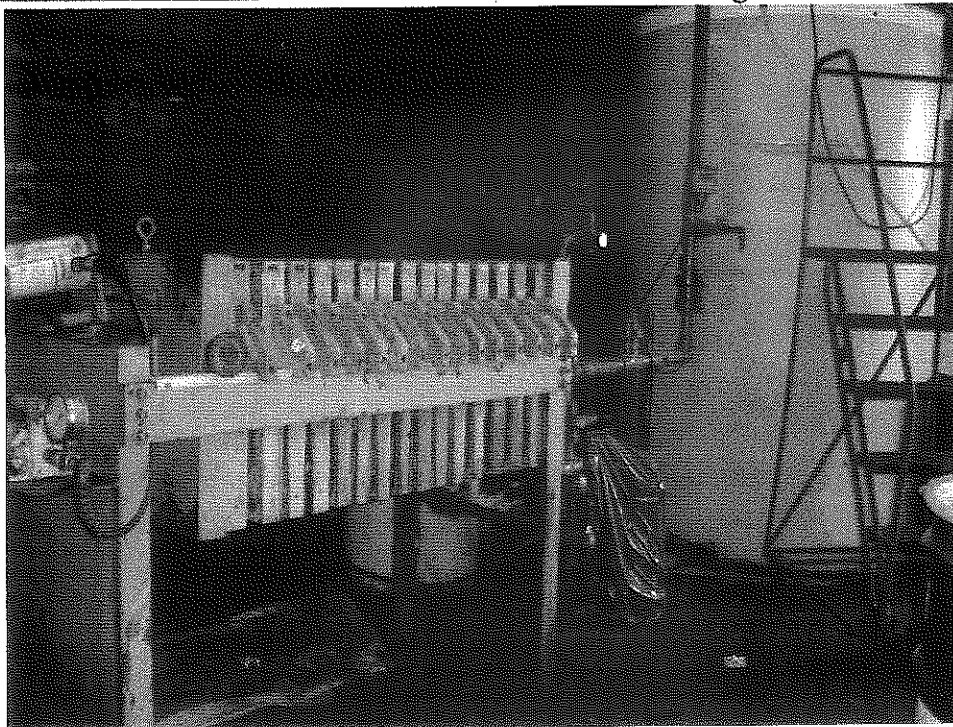


Photo 6: Filter press

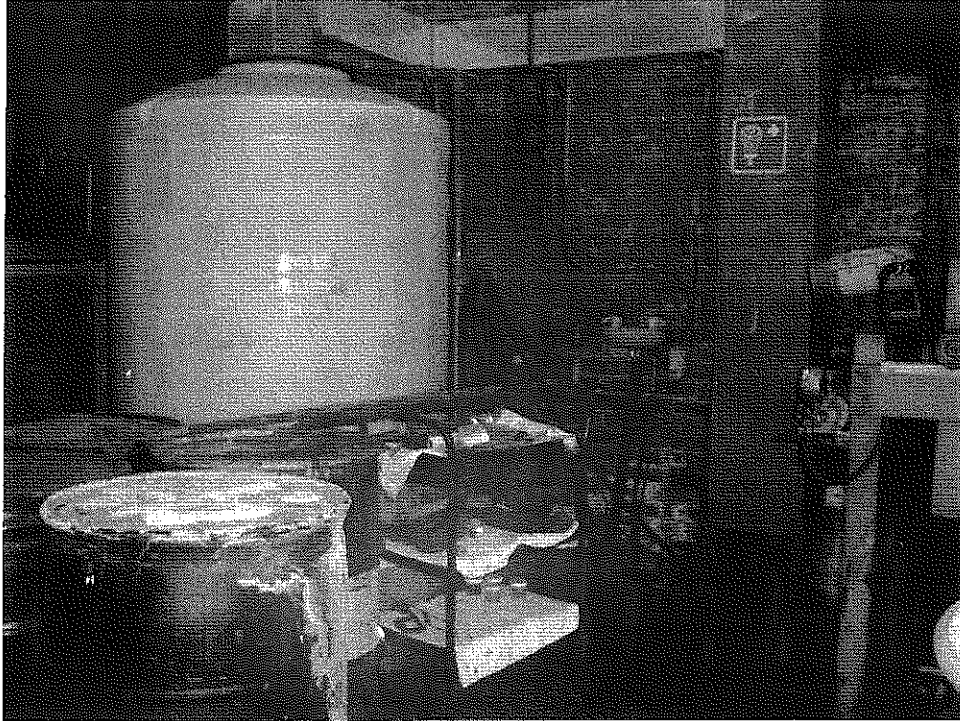


Photo 7: pH tank (water holding tank)

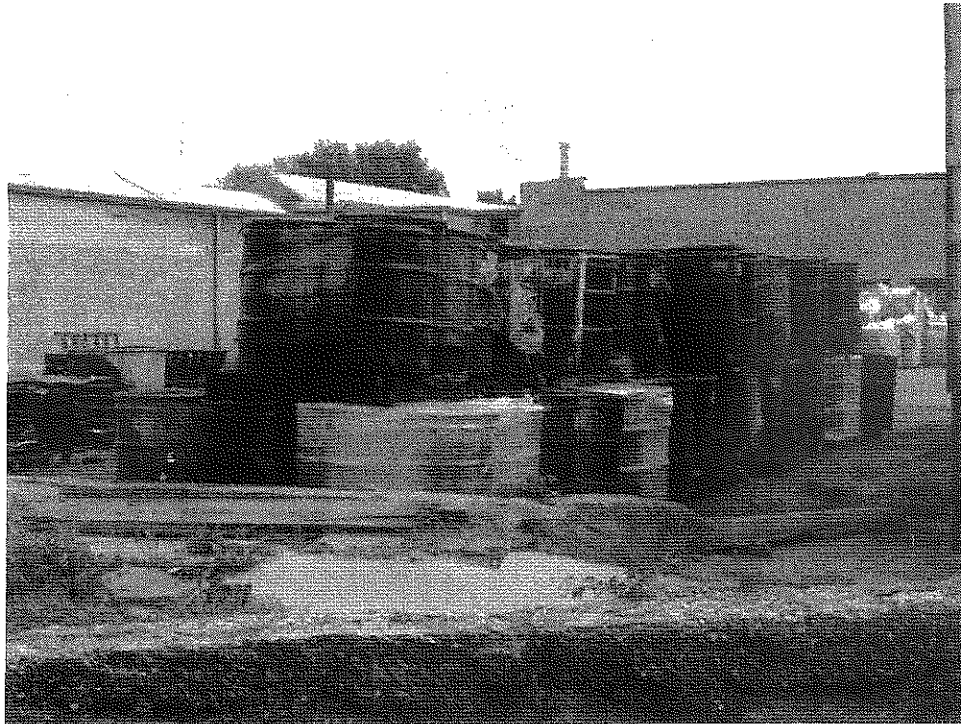


Photo 8: Empty & ink waste drums

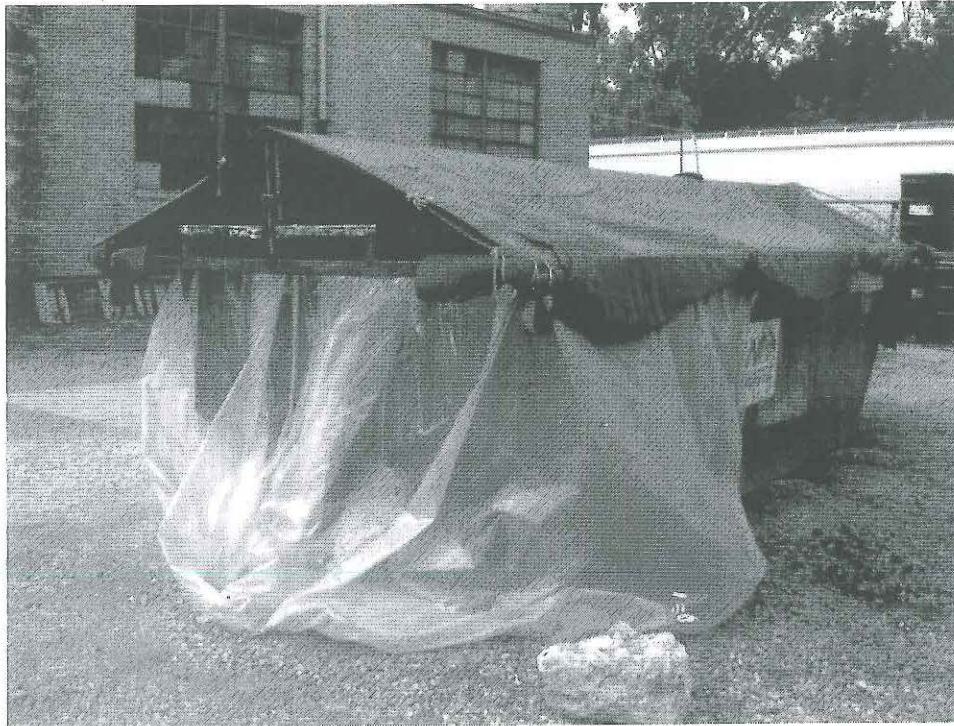


Photo 9: Roll-off box of filter cake



Photo 10: Used Oil containers



Photo 11: Ink waste



Photo 12: Used Oil container

Installation Name:
Bio Star Films
Date of Inspection:
9/10/2007

Location Address:
4848 South Hoyne Ave
U.S. EPA Inspector:
Graciela Scambiaterra

EPA ID Number:
ILD 984 775 726

Regulation	RCRA CESQG INSPECTION CHECKLIST (PART 721.105(g))	Violation
721.102(f)	<p>Section 721.105 Special Requirements for Hazardous Waste Generated by Conditionally-Exempt Small-Quantity Generators (<100 Kg/mo.)</p> <p>Has the owner/operator provided appropriate documentation to demonstrate that the material is not a solid waste or is conditionally exempt from regulation? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Are any of the following applicable:</p> <p>a) The generator has generated a total of one or more Kg of acute hazardous waste in a calendar month? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/></p> <p>b) The generator has generated a total of 100 Kg or more of any residue or contaminated soil, waste or other debris resulting from the clean-up of a spill of acute hazardous waste? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/></p> <p>c) The generator has generated greater than 100 Kg of hazardous waste in a calendar month? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/></p> <p>d) The generator has accumulated greater than 1000 Kg of hazardous waste on site at any one time? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/></p> <p>Note: If the answer to any of the above questions is "Yes", the firm is a generator of hazardous waste fully subject to regulation under the applicable parts of 35 IAC Parts 700 through 728 and the notification requirements of Section 3010 of RCRA. Complete the appropriate checklist.</p>	721.102(f)
722.111	<p>Has the generator made a proper hazardous waste determination pursuant to Section 722.111? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	722.111
721.105(g)(3)	<p>Has the owner/operator treated or disposed of the hazardous waste on-site? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input checked="" type="checkbox"/></p>	
721.105(g)(3)	<p>Has the owner/operator ensured delivery to a permitted off-site treatment, storage or disposal facility pursuant to Section 721.105(f)(3) or 721.105(g)(3)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p>	721.105(g)(3)
721.105(j)	<p>Note: A conditionally-exempt small-quantity generator who mixes its hazardous waste with used oil which is destined to be burned for energy recovery must comply with the requirements in Part 739.</p> <p>Comments:</p>	